

DOCKETED

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Einride Comments on CA NEVI Program Proposal

Additional submitted attachment is included below.



**To: California Energy Commission (CEC),
California Department of Transportation (Caltrans)**

RE: Comments on CA NEVI Program proposal
June 21, 2022

To whom it may concern,

My name is Michelle Avary, and I am writing to you on behalf of Einride in my capacity as Vice President of Government Affairs & Product Strategy to submit an official comment on the recently proposed California Deployment Plan for the National Electric Vehicle Infrastructure Program (CA EVI).

For context, Einride is a freight technology company that provides technologies for the turn-key transition of freight operations from diesel to electric trucks. Specifically, we procure and install charging hardware for electric trucks, as well as operating the largest EV truck fleet in the U.S. as a service for our shipping customers - in pursuit of our mission to decarbonize freight through intelligent movement.

Naturally, Einride is deeply interested in the National Electric Vehicle Infrastructure (NEVI) initiative and all the individual state programs, as we believe these funding programs can be used to accelerate the transition to electric vehicles across segments, aligning with our mission. Einride plans to deploy 100+ Class 8 heavy-duty trucks in California in the next 12 months, and hence has a particular interest in the evolution of EV charging infrastructure in the state of California.

Following the informative webinar on June 14, 2022, on the CA EVI plan, I am submitting the following comments for your consideration as the program evolves:

- **Diesel truck emissions are substantially harmful to Californians, and disproportionately affect disadvantaged communities:** Thousands of diesel vehicles operate in and around California's ports, such as Long Beach and Oakland, creating NOx, CO2, and particulate emissions which have substantial and lasting impacts on the health of the communities around them. Hence, targeting commercial, heavy-duty diesel engine emissions should be of the highest priority for CEC and Caltrans to improve the health of the state's residents as well as be part of California's overall climate goals. If CEC and Caltrans are serious about improving quality of life in disadvantaged communities, why not deploy these funds in pursuit of immediate and lasting benefits in improved air quality?
- **Visible, reliable, abundant EV charging infrastructure is crucial for the adoption of EVs - especially trucks:** Small fleets and individual owner-operators may be



well-positioned to benefit from vehicle incentive programs such as HVIP, but there remains a significant hesitation on the reliability and location of chargers which presents an ongoing barrier to EV adoption. Einride frequently hears this feedback from our customers, which necessitates us to work proactively to find and deliver solutions for EVSE for every truck we ship. Our prospective customers remain concerned about the future of heavy-duty EV charging, particularly in areas where passenger cars are given priority over charging for trucks. Moreover, due to the high power capacity needed to charge heavy-duty vehicles, it may be possible to add charging capacity for light passenger vehicles at heavy-duty vehicle charge sites, but it may not be possible to bring in the capacity to charge heavy-duty vehicles at sites set up for passenger cars/

- **CA will rapidly reach saturation of EV charging infrastructure along AFCs in major metro areas:** Thanks to the leadership of various Californian agencies in incentivizing the adoption of electric passenger cars, the state is already leading the rest of the nation in EV adoption and building charging stations for electric cars, particularly in major population centers such as the greater Los Angeles area and the San Francisco Bay Area. Hence, the current stance of dedicating all funds to light-duty vehicle charging, and deprioritizing the needs of heavy-duty vehicles may prove short-sighted.
- **Heavy-duty EVs will require substantially different charging infrastructure:** In terms of power needed, location, design, space, placement, hardware suitability, and more. Hence, we recommend a specific portion of the CA EVI funds be carved out for developing the right medium and heavy-duty charging solutions - do it right now, or do it twice.

In addition to the comments above, we also wholeheartedly support the verbal feedback offered by representatives from the Port of Long Beach and Volvo Trucks during the June 14th webinar, echoing the spirit of their comments imploring CEC and Caltrans to consider the needs of medium and heavy-duty vehicles as the CA EVI program develops.

On behalf of Einride, we look forward to future opportunities to provide input on the development of CA EVI and other relevant public funding programs as an opportunity to provide insights from our global experience in deploying electric freight solutions. Should you have any questions about our comments, please do not hesitate to contact me directly. We thank you for your consideration.

Yours faithfully,

DocuSigned by:
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Michelle Avary
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Einride